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March 23, 1990

TO: File

FROM: D. Wayne Hedberg, Permit Supervisor/Hydrologist *DWH*

RE: Meeting Documentation, Redmond Clay & Salt Company, Inc., Redmond Clay and Salt Mines, M/039/002, San Pete County, Utah

On March 21, 1990, Mr. Milo Bosshardt and Mr. Larry Bosshardt of Redmond Clay & Salt Co., met with the minerals staff to discuss outstanding permitting issues regarding their salt and clay mining operations in San Pete & Sevier County, Utah. The Division requested that the operator come to Salt Lake City for the meeting. We hoped to give the operator a better understanding of what type of information and the level of detail required to permit their mining operations.

Milo Bosshardt indicated that his family has owned and operated the salt and clay mines for some 30-40 years now. He also stated that the area has at least a 100 year mining history. When asked what the expected mine life would be, he indicated that there was sufficient reserves to mine at least another 100 years. We discussed the need for determining a postmining landuse and returning the land to a useful condition upon cessation of operations. Typically, a minesite is revegetated to an acceptable postmining landuse (eg., native rangeland, wildlife habitat, cropland, industrial complex, etc.). We indicated that a legitimate post mining use for existing mining facilities/structures can be approved by the Division.

The operator indicated that it may be quite difficult to reestablish vegetation upon mine closure as there was little if any vegetation that existed prior to active mining of the property. He also indicated that the salt deposit was originally located because of the barren red clay and salt exposed at the surface. We acknowledged that there may be some justification for a variance in this regard. He also indicated there was little, if any topsoil present or salvaged during historic mining actions.

We also discussed basic reclamation and recontouring requirements for the open portals, pits and trenches. We acknowledged that there is not sufficient overburden or waste material to completely backfill the pits. Our primary concern is to eliminate any public health and safety concerns with the mine site upon closure. Therefore we would require the operator to reduce highwalls, backfill and recontour to the extent practicable and to a degree sufficient to eliminate/minimize the public health and safety concern.

This possibility of subsidence occurring over the cavernous underground salt mines was also discussed with the operator. The importance of including a discussion of this potential as part of the environmental impact section of the regulations was stressed. Technical justification as to why it will or will not subside should be addressed by the operator. The projected continued development of the sinkholes in and adjacent to the active mining operation should also be discussed. A basic understanding as to the cause of these features should be discussed in the mine plan application.

The potential for impacting the local and regional surface and groundwater resources was mentioned as well. Simple statements like "none", "not applicable" or "unknown" cannot be accepted by the Division. A technical explanation with supporting information must be provided to substantiate/justify the operator's position on the projected impacts.

The operator asked how the state can legally come onto their private property and tell them what they can and cannot do? We explained the statutory authority which gives the Division the ability to regulate mining operations on all lands with the state of Utah. We indicated that this was not a debatable issue and that this position was established @15 years ago upon passage of the Mined Land Reclamation Act.

The operator asked what was wrong with the maps they have provided to date. We pulled some examples of maps which exhibited the level of detail necessary to meet our needs and the regulatory requirements. We also gave the operator several local sources to obtain copies of necessary reference maps.

We also discussed the reclamation surety requirements for the minesites. We gave the operator several examples of reclamation estimates prepared by the Division to use as a reference in assembling the necessary information to enable the Division to calculate a representative surety for the Redmond sites.

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At one point, Mr. Bosshardt indicated that in his opinion, they had answered all of our questions and addressed our regulations to the best of his knowledge, and we could acquire whatever else we needed ourselves. We indicated we could not draft the permit for the operator, but that we would provide assistance and guidance to the extent possible in helping them prepare a complete application. We suggested that they may need to acquire outside professional assistance to address those permitting requirements that may be beyond their personal knowledge or ability to address. We acknowledged we could not require the operator to seek professional help, but in our opinion it might prove advantageous in acquiring their mine permit in a more expeditious manner.

We also suggested that the operator arrange to come in and spend some time in the Division's mine plan/records room going through a number of approved mining and reclamation permit applications. This would help indicate what level of detail is typically required in preparing a permit application. There are a number of applications which we could refer the operator as representative for developing his mining and reclamation plan.

Mr. Bosshardt indicated they would like to come in and look at a number of applications which we should have on file for mining operations in the general vicinity of their operations. We indicated that we do have certain approved applications on file, but that there are some we may not be aware of. We informed the operator we would appreciate any knowledge of unpermitted operations which would fall within our jurisdiction. It would be our intention to require permit applications from those unpermitted mining operations as well.

Upon the termination of our meeting it was agreed that the operator would proceed to acquire and develop supplemental information to address the areas we had discussed. We established a tentative June 4, 1990, date to regroup to discuss this supplemental information and the adequacy of the same. The operator indicated he would likely be calling us with questions during the interim and arranging a time to come in and look at several existing permit applications on file.

dwh
cc: Milo Bosshardt
Lowell Braxton
Minerals Team
WMN2/8-10